

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
CINDY SHERI HOLIFIELD : CHAPTER 13
Debtor. :

PNC BANK, National Association :
Movant, :
:
vs.
CINDY SHERIF HOLIFIELD : CASE NO. 5-18-01447
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Cindy Holifield, the Debtor, and files an Answer to PNC Bank's Motion for Relief From the Automatic Stay:

1. Cindy Holifield (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtors Counsel is in the process of contacting the Debtor to ascertain if the payments have been made or if the Debtor is in the possession of the funds needed to cure the alleged default.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: November 19, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 19, 2018, he caused a true and correct copy of Debtor's Answer to PNC Bank's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James Warmbrodt, Esq. at jwarmbrodt@kmllawgroup.com

Dated: November 19, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire